



HON. MURIEL GOODE-TRUFANT
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LAW DEPARTMENT
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December 16, 2024

VIA ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, New York 10007

*Time to respond to the Complaint
is extended to 1/24/25. The
1/6/25 Conference is canceled,
so ordered.*

Re: *K.P., et al. v. New York City Dep't. of Educ.*, 24-cv-7230 (JGK)(JW)

Dear Judge Koeltl:

12/17/24 [Signature] U.S.D.-2

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, the Hon. Muriel Goode-Trufant, attorney for Defendants in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on administrative proceedings under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* ("IDEA"), as well as for this action.

Defendant writes to respectfully request that the December 23, 2024 answer deadline be extended 6 weeks to February 3, 2025. Plaintiff consents to a 2-week extension only, stating that there are no updates on the case. This is the second request for an extension. The first request was made on October 17, 2024 and granted by Your Honor the following day. The requested extension will allow Defendant to complete its internal review process and make an initial offer to Plaintiff. Additionally, Defendant writes to respectfully request that the January 6, 2025 initial conference be adjourned 6 weeks to February 18, 2025 (or a time thereafter more convenient for the Court) to allow the parties time to engage in settlement negotiations. Plaintiff again consents only to a 2-week extension. This is the first request for an extension. The parties are hopeful that they can settle this matter without further burden on the Court's time.

Thank you for considering these requests.

Respectfully submitted,

/s/

Martha Nimmer
Special Assistant Corporation Counsel

cc: Chris Barnett, Esq. (via ECF)